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LLC

*Via ECF*

**April 10, 2024**

Hon Renee Marie Bumb  
United States District Court  
District of New Jersey  
Mitchel H. Cohen Bldg., Courtroom 3D  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

Re: *Nixon v. Grande Cosmetics, LLC*, No. 22-cv-6639 (D.N.J.)

Dear Judge Bumb:

We represent plaintiff Brenda Nixon in the above-referenced matter. Last week, as directed by Your Honor, Plaintiff filed a supplemental memorandum in further support of Plaintiff's motions for final approval and for attorneys' fees, costs, and service award. *See* ECF 60. That memorandum attached a declaration from ClaimScore (ECF 60-2) (redacted version at ECF 61-2). The ClaimScore declaration, in turn, referenced backup data attached to the declaration (*see id.* at ¶ 40).

The backup data was not filed under seal because the file sizes are enormous; well beyond the size limits for uploads via the Court's CM/ECF system. We also learned the judiciary's email system disallows file download links (e.g., Dropbox, Box, etc.), so we could not email a link to Your Honor's Chambers. The backup files also span more than two dozen files, comprised of over 36,000 pages, in very small 2.8pt font.

Given the size and density of the backup data, Plaintiff has not yet submitted the backup data referenced in the ClaimScore declaration. Nevertheless, to ensure full transparency with Your Honor, we remain at your disposal to work with Chambers to figure out a means of transmitting the backup data if Your Honor wishes to review or sample the data, which is already described in detail in the ClaimScore declaration.

Respectfully,



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cc: All Counsel (via ECF)